

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**JOLEEN YOUNGERS, as personal
representative of the ESTATE OF
JASMINE WILLIAMS; TONYA
PETRIDES; and TONYA PETRIDES as
next friend of M.R.,**

Plaintiffs,

vs.

125-cv-00012-SMD-JFR

**CORECIVIC, INC.; CORECIVIC, LLC; CORECIVIC
OF TENNESSEE, LLC; NATALIE GRINE, in her
individual and official capacity as Cibola County's
records custodian; ANNA MARIE LOPEZ, in her
individual and official capacity as Cibola County
Sheriff's Office's records custodian; JACOB LEE, in
his individual and official capacity as records custodian
of the Cibola County, Cibola County Correctional
Center, CoreCivic LLC, CoreCivic of Tennessee, LLC,
CoreCivic, Inc.; and STRUCK LOVE BOJANOWSKI
& ACEDO PLC,**

Defendants.

**PLAINTIFFS' SECOND UNOPPOSED MOTION
FOR ORDER EXTENDING D.N.M. LR-CIV 26.6 DEADLINE**

Plaintiffs Joleen Youngers, as personal representative of the Estate of Jasmine Williams; Tonya Petrides; and Tonya Petrides as next friend of M.R., through their counsel, Ives & Flores, PA ("Plaintiffs"), hereby move for an order extending Plaintiffs' D.N.M. LR-Civ 26.6 deadline to file a motion to compel regarding discovery objections that CoreCivic, Inc., CoreCivic, LLC, CoreCivic of Tennessee, LLC ("CoreCivic Defendants") and Jacob Lee served on February 14, 2025. Defendants do not oppose the requested relief. In support of their motion, Plaintiffs state as follows:

1. The CoreCivic Defendants and Jacob Lee served responses and objections to Plaintiffs' discovery requests on February 14, 2025.

2. Under the United States District Court for the District of New Mexico's local rules, Plaintiffs' deadline to file a motion to compel regarding those objections was March 7, 2025. *See* D.N.M. LR-Civ 26.6 (stating that a party served with discovery objections must file a motion to compel within 21 days of that service).

3. The Court granted Plaintiffs' unopposed motion to extend Plaintiffs' D.N.M. LR-CIV 26.6 deadline to March 28, 2025. *See* Order, filed March 7, 2025 (Doc. 20).

4. The parties continue to confer regarding those responses and objections. There is good cause to extend Plaintiffs' Local Rule 26.6 deadline from March 28, 2025 to April 28, 2025 so that the parties have sufficient time to confer and, if necessary, seek the Court's assistance in a status conference pursuant to the Hon. Judge John F. Robbenhaar's procedures for discovery disputes. *See* D.N.M. LR-Civ. 26.6 (stating that, for good cause, the Court may "change the twenty-one (21) day period"); *Benavidez v. Sandia Nat'l Lab'ys*, 319 F.R.D. 696, 724 (D.N.M. 2017) (Browning, J) (noting that courts routinely grant unopposed motions to extend the D.N.M. LR-Civ 26.6 deadline).

5. The requested extension would not interfere with any other deadlines in this proceeding.

CONCLUSION

For the reasons argued herein, the Court should enter an order extending Plaintiffs' D.N.M. LR-CIV 26.6 deadline to April 28, 2025, regarding the CoreCivic Defendants' and Jacob Lee's discovery responses served on February 14, 2025.

Respectfully submitted,

IVES & FLORES, PA

/s/ **Henry A. Jones**

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CERTIFICATE OF SERVICE

I hereby certify that, on March 26, 2025, a copy of the foregoing motion was served by email to:

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